

**Propanoic acid, 2-hydroxy-, compound with 3-[2-(dimethylamino)ethyl] 1-(2-ethylhexyl)(4-methyl-1,3-phenylene)bis[carbamate] – Comments of Environmental Defense**

(Submitted via Internet 1/15/03)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for propanoic acid, 2-hydroxy-, compound with 3-[2-(dimethylamino)ethyl] 1-(2-ethylhexyl)(4-methyl-1,3-phenylene)bis[carbamate] (1:1) (CAS # 68227-46-3).

The EPA's High Production Volume (HPV) Challenge is a voluntary program in which chemical producers and importers accept the challenge to voluntarily provide basic toxicity information on chemicals they produce or import in excess of one million pounds per year. The information requested consists of that outlined in the Organization for Economic Cooperation and Development's Screening Information Data Set (OECD/SIDS).

The submission for CAS # 68227-46-3 contains no robust summary and no data for any SIDS category requested. This document has no supporting data of any kind. Instead, it is a table of the SIDS data elements, with a "no" for each row in "Data available," and a "yes" in each row for the "Testing needed."

We understand (and a cursory search using the CAS # we conducted also suggests) that there may not be a great deal of information on what appears to be a mixture of two chemicals described by a single CAS #. However, it is difficult to believe that a company that is producing or importing a chemical product in excess of one million pounds per year has no knowledge even of the chemical structure(s) or the most basic physical/chemical properties. This circumstance seems so extraordinary to warrant some discussion. Absent such discussion, it's not clear that the company (which has chosen to have its name withheld) is actually complying with the requirements of the HPV program. (Total lack of ecotoxicity and mammalian toxicity information is also surprising, though to a lesser degree.)

Thank you for this opportunity to comment.

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